



Ms. Eileen Tutt  
Assistant Secretary  
California Environmental Protection Agency (CalEPA)  
1001 -- I Street  
P.O. Box 2815  
Sacramento, CA 95812-2815

Dear Ms. Tutt:

Thank you for the opportunity to provide comments from AAA of Northern California on the draft California Climate Action Team Report to the Governor and Legislature.

AAA of Northern California supports programs that will help California meet the following environmental goals:

- Preservation and conservation of state and national parks and other unique natural and scenic resources
- Conservation of limited transportation fuel resources through greater fuel efficiency
- Promotion of more transportation choices and options for the traveling public
- Improving air quality and reducing the negative health impacts of air pollution

As a result, AAA supports the idea of making reductions in climate change gas emissions from anthropogenic (man-made) sources arising within California. AAA believes that climate change strategies should make use of incentives to reduce or mitigate greenhouse gas emissions across all sectors responsible for those emissions. In the transportation sector, such incentives could be developed to stimulate use of alternative transportation modes, high-occupancy vehicles and carpooling; to promote purchase of fuel-efficient vehicles; and to increase the market penetration for alternative fuels.

In recent years, AAA has supported some specific legislation for programs aimed toward fulfilling the climate change emissions reduction goals that Governor Arnold Schwarzenegger established by Executive Order #S-3-05. AAA of Northern California has supported three programs:

1. AB 844 – Fuel Efficient Tire Program
2. AB 1007 – Development of a State Plan to Increase the Use of Alternative Fuels for Transportation
3. Low Emission Vehicle (LEV) Program – In September 2004, the California Air Resources Board (CARB) adopted regulations regarding climate change emissions from new purchase vehicles as mandated by AB 1493. In 2005, as public concern grew over increasing demands upon limited transportation fuel supplies and the resulting increases in the retail cost of gasoline, AAA of Northern California indicated its support for the climate change emissions standards incorporated into the CARB low emissions vehicle (LEV) program.

We are glad to see included in the Climate Action Team report these three existing programs for which we have already indicated our support. We hope and expect that each of these three programs will result in real and quantifiable reductions in climate change emissions for the state of California.

The most obvious gap in the California Climate Action Team report is a discussion of the full range of strategies that would reduce climate change emissions by providing the traveling public with more fuel efficient transportation choices beyond the three programs described above. AAA of Northern California believes that the best overall strategy for California is to increase the elasticity of consumer response to higher energy prices by providing more choices to consumers. We support public information and positive incentives to encourage

consumers to make informed choices in the marketplace, but we do not support punitive measures against automobile ownership and use.

We support increased choices and investment in public transportation, carpooling, more efficient vehicles, and alternative fuels. The Climate Action Team report would benefit from greater discussion of the climate emissions reduction impacts of public transit investments and programs and projects to support carpooling. As a result, our most significant recommendation for the final report would be to include a quantifiable estimation of climate change related emissions reductions from public transportation and carpooling programs and projects.

While the draft Climate Action Team report neglects the potential benefits of transit and carpooling, it also appears to overestimate the potential climate change emissions reductions that may be reliably attributed to smart growth and integrated transportation and land use policies. Previous work at the USEPA Office of Policy during the 1990s found that it is very difficult to quantify the potential benefits of actions in this area with a high degree of certainty. We recommend more documentation to improve the credibility of the projected climate emissions reductions from smart growth.

The potential for emissions reductions from a major investment in ITS (Intelligent Transportation Systems) may also be worth considering, but the state would need to make a much larger commitment to ITS than it has done to date in order to raise these types of activities to a higher level of significance.

Finally, AAA would like to express concern over the proposal for a transportation public goods charge. We believe that further examination of a full range of options for funding climate change emissions reduction programs should be undertaken. In California and other states, fees on electricity and public utilities are most often used to fund energy efficiency programs such as those included in the Climate Action Team report. The viability and feasibility of the full range of user fees or benefit fees should be well considered before making final decisions about this issue.

Thank you for the opportunity to comment on this important topic.

Sincerely,

Lewison Lee Lem, Ph.D.  
Transportation Policy Manager  
AAA of Northern California

Cc:

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